

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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	:
PAM, et al.,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
ARAB BANK, PLC,	:
	:
Defendant.	:
	:
-----X	

Case No. 1:18-cv-04670 (BMC)(PK)

**FIRST SUPPLEMENTAL
COMPLAINT**

Pursuant to Rule 15(d) of the Federal Rules of Civil Procedure and the Stipulated Order dated December 2, 2018 permitting Plaintiffs to add Mayer Moskowitz, Avraham Moskowitz, and Rachel Winkler as plaintiffs in this action, Plaintiffs file this First Supplemental Complaint. In addition to the parties and claims already alleged, Plaintiffs Mayer Moskowitz, Avraham Moskowitz, and Rachel Winkler, by their attorneys, allege the following upon information and belief:

THE ADDITIONAL PLAINTIFFS

Ben Meir Family Members

1. Meshulam Ben Meir is a United States citizen who lives in Ofra, Israel. On July 30, 2002, he was attacked by a Palestinian suicide bomber who detonated a bomb about five meters away from Ben Meir. The blast occurred at a falafel stand on Hanevi'im Street in the center of Jerusalem. Ben Meir was seriously injured along with four others. He lost all hearing

in his left ear and suffered some loss of hearing in his right ear. He has suffered pain, trauma, mental anguish, extreme emotional distress, medical expenses and other financial losses, all to his damage.

2. The terrorist who exploded the bomb was Muhssien Attah, a/k/a Hazem Atta Yousef, a/k/a Majd 'Atta, an agent of Al Aqsa Martyrs Brigades ("AAMB"). AAMB claimed responsibility for the explosion.

3. This terror attack was within the scope of the scheme and conspiracy described in the Complaint in this action in which Arab Bank was a knowing and active participant.

4. Meshulam Ben Meir was a plaintiff in the action *Litle, et al. v. Arab Bank, PLC*, Civil Action No. 1:04-cv-05449-BMC-PK.

5. Plaintiff Mayer Moskowitz is a citizen of the United States and a resident of New York. He is the father of Meshulam Ben Meir. As a result of the attack upon his son, Meshulam, Mayer Moskowitz has suffered severe mental anguish and extreme emotional pain and suffering.

6. Plaintiff Avraham Moskowitz is a citizen of the United States and a resident of the State of Israel. He is the brother of Meshulam Ben Meir. As a result of the attack upon his brother, Meshulam, Avraham Moskowitz has suffered severe mental anguish and extreme emotional pain and suffering.

7. Plaintiff Rachel Winkler is a citizen of the United States and a resident of New York. She is the sister of Meshulam Ben Meir. As a result of the attack upon her brother, Meshulam, Rachel Winkler has suffered severe mental anguish and extreme emotional pain and suffering.

INCORPORATION OF ALLEGATIONS AND CLAIMS FOR RELIEF

8. These additional Plaintiffs expressly incorporate herein by reference the allegations and claims made in paragraphs 1-5 and 71-342 of the Complaint filed on or about August 17, 2018 in the above-captioned matter.

PRAYER FOR RELIEF

WHEREFORE, these additional Plaintiffs pray that this Court:

- a) Accept jurisdiction over this action;
- b) Enter judgment against Arab Bank and in favor of each Plaintiff for all compensatory and other damages in such amounts as shall be determined at trial, plus pre- and post-judgment interest at the legal rate;
- c) Enter judgment against Arab Bank and in favor of each Plaintiff for treble damages pursuant to 18 U.S.C. § 2333(a);
- d) Enter judgment against Arab Bank and in favor of each Plaintiff for any and all costs sustained in connection with the prosecution of this action, including attorneys' fees, pursuant to 18 U.S.C. § 2333(a); and
- e) Grant such other and further relief as justice may require.

PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Dated: December 3, 2018

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